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November 14, 2017

**VIA ECF**

Honorable Richard J. Sullivan  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Natalie Gross v. Celine, Inc.*  
Case No.: 17-cv-08378 (RJS)

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Dear Judge Sullivan:

This firm represents Defendant Celine, Inc. (“Defendant”) in the above-captioned matter. Pursuant to your Individual Practice Rules, we write to respectfully request that Defendant’s time to answer, move or otherwise respond to the Complaint, which is currently due on December 1, 2017, be extended up to and including January 15, 2018 (with any related deadlines extended accordingly).

This request is made to permit the parties additional time to pursue an amicable resolution of this matter without the need for further litigation. Plaintiff’s Complaint involves access to Defendant’s website, which, due to its highly technical nature, requires the involvement of a variety of specialists, including accessibility auditors, to assess and assist with the technical aspects of the Complaint and any potential resolution. This extension of time will allow the parties to continue these discussions, without requiring Defendant to expend additional resources to respond to the Complaint when such a response may be ultimately unnecessary.

This is Defendant’s first request for an extension of time to respond to the Complaint and Plaintiff’s counsel consents to this request.

We thank the Court for its consideration of this request.

Respectfully Submitted,

*/s/ Joshua A. Stein*

Joshua A. Stein

cc: Javier L. Merino (via ECF)  
Shira M. Blank (via ECF)